

DIRECTV LATIN AMERICA, LLC,
individually and in the right and on behalf
of LATIN AMERICAN SPORTS, LLC,

PARK 610, LLC,
CARLOS VICENTE AVILA,
ROBERTO TIMISTIT,
CARLOS PRATOLA,
ALEJANDRO ZUNDA CORNELL and
DIEGO CLEMENTE,
DOES 1 through 10,

as a Nominal Defendant.

ECF CASE

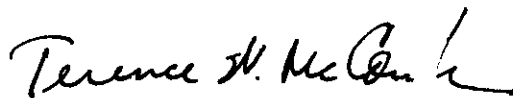
PLEASE TAKE NOTICE that upon the Declaration of Terence W. McCormick, Esq., dated September 5, 2008, the Proposed Second Amended Complaint annexed thereto, Plaintiff's Memorandum of Law dated September 5, 2008, and upon all prior pleadings and proceedings had herein, plaintiff, DIRECTV Latin America, LLC, will move this Court pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, before the Honorable Victor Marrero, United States District Judge, at the United States Courthouse, Courtroom 20B, 500 Pearl Street, New York, New York 10007, at a time and date to be determined by the Court for an Order granting leave to amend the Amended Verified Complaint herein, and in opposition to the motion by

Defendants Park 610, LLC, Carlos Vicente Avila and Roberto Timistit to dismiss the causes of action against them in the Amended Verified Complaint.

Subject to such other direction as the Court may give, pursuant to Rule 6.1(b) of the Local Rules of the United States District Court for the Southern District of New York, papers in opposition to this motion, if any, shall be served within ten business days of the service of this Notice of Cross-Motion.

Dated: New York, New York
September 5, 2008

MINTZ & GOLD LLP



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